1 2	THOMAS M. HERLIHY (SBN 83615) JOHN T. BURNITE (SBN 162223) WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP		
3	525 Market Street, 17 th Floor		
4	San Francisco, CA 94105-2725 Tel.: (415) 433-0990		
5	Fax: (415) 434-1370		
6	Email: herlihy@wilsonelser.com john.burnite@wilsonelser.com		
7	Attorneys for Defendants		
8	UNUM GROUP (formerly known as		
9	UNUMPROVIDENT CORPORATION) and THE PAUL REVERE LIFE INSURANCE COMPANY		
10			
11			
12	UNITED STATES DISTRICT COURT		
13	NORTHERN DISTRICT OF CALIFORNIA		
14	SEAN S. MAY, M.D.) Case No.: C09-01537 VRW (ADR)	
15	Plaintiff,))	
16	vs.) STIPULATION TO EXTEND) RESPONSIVE PLEADING DEADLINE	
17	UNUMPROVIDENT CORPORATION, THE	AND TO CONTINUE CASEMANAGEMENT CONFERENCE;[PROPOSED] ORDER	
18	PAUL REVERE LIFE INSURANCE COMPANY and UNUM GROUP, inclusive,) [PROPOSED] ORDER)	
19	Defendants.))	
20	Defendants.))	
21			
22			
23			
24			
25			
26			
27			
28			

1	The parties, plaintiff Sean S. May, M.D. and defendants Unum Group (formerly known		
2	as UnumProvident Corporation), and The Paul Revere Life Insurance Company are in the		
3	process of discussing settlement, which may include setting an early mediation. Accordingly,		
4	the parties, through their respective attorneys, respectfully request that the court approve this		
5	stipulation and extend defendants' responsive pleading deadline and the initial case management		
6	conference.		
7	Pursuant to Northern District Local Rule 6-1(a), the parties, hereby stipulate that		
8	defendants shall have an extension to respond to the complaint from March 8, 2010 to May 10,		
9	2010. In the alternative, if the CMC date is not continued, the parties stipulate that defendants'		
10	responsive pleading shall be extended from March 8, 2010 to March 29, 2010.		
11	The parties further stipulate to continue the Case Management Conference presently		
12	scheduled for April 22, 2010 to June 24, 2010.		
13	Good cause exists for the parties' stipulation and proposed order insofar the continued		
14	dates will promote the public policy of encouraging parties to explore early resolution of		
15	litigation.		
16	IT IS SO STIPULATED.		
17	KNOX RICKSEN, LLP		
18		· • · · · · · · · · · · · ·	
19	Dated: March 8, 2010	By/s/	
20		Thomas E. Fraysse Attorney for Plaintiff	
21		SEAN S. MAY, M.D.	
22		WILSON, ELSER, MOSKOWITZ, EDELMAN &	
23		DICKER LLP	
24			
25	Dated: March 8, 2010	By/s/ Thomas M. Herlihy	
26		John T. Burnite Attorney for Defendants	
27		UNUM GROUP (formerly known as	
28		UNUMPROVIDENT CORPORATION) and THE PAUL REVERE LIFE INSURANCE COMPANY	
		-1-	
	STIPULATION TO EXTEND RESP	ONSIVE PLEADING DEADLINE AND TO CONTINUE CASE MANAGEMENT	

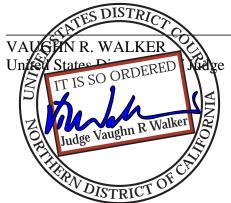
CONFERENCE; [PROPOSED] ORDER

Case No.: C09-01537VRW (ADR0

ORDER

IT IS SO ORDERED that defendants shall have an extension to respond to the complaint from March 8, 2010 to and including [March 29, 1010 or May 10, 2010]. It is further ordered that the Case Management Conference is continued from April 22, 2010 to June 24, 2010.

Date: March ____, 2010



-2

Case No.: C09-01537VRW (ADR0